

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA DIVISION**

In Re: TAHIRA M. WYATT Debtor(s) NATIONSTAR MORTGAGE LLC Movant v. TAHIRA M. WYATT Debtor(s) CHRISTINE C. SHUBERT Trustee Respondent(s)	Chapter 7  Case Number: 25-12547-djb
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**MOTION FOR RELIEF FROM AUTOMATIC STAY WITH RESPECT TO PROPERTY: 1152  
EAST SHARPNACK ST, PHILADELPHIA, PA 19150**

Nationstar Mortgage LLC, through its Counsel, Stern & Eisenberg PC, respectfully requests the Court grant its Motion for Relief and in support thereof respectfully represents as follows:

1. Movant is Nationstar Mortgage LLC (hereafter referred to as “Movant”).
2. Debtor(s), Tahira M. Wyatt (hereinafter, “Debtor(s)”), is/are, upon information and belief, adult individual(s) whose last-known address is 1152 East Sharpnack St, Philadelphia, PA 19150.
3. On August 23, 2010, Tahira Monique Wyatt, executed and delivered a Note in the principal sum of \$114,458.00 to Allied Mortgage Group, Inc. A copy of the Note is attached as Exhibit “A” and is hereby incorporated by reference.
4. As security for the repayment of the Note, Tahira Monique Wyatt, executed and delivered a Mortgage to Mortgage Electronic Registration Systems Inc., as Nominee for Allied Mortgage Group, Inc. The Mortgage was duly recorded in the Office of the Recorder of Deeds in and for Philadelphia County on September 2, 2010 in Book , Page and/or Instrument 52254947. A copy of the Mortgage is attached as Exhibit “B” and is hereby incorporated by reference.
5. The Mortgage encumbers Debtor’s real property located at 1152 East Sharpnack St, Philadelphia, PA 19150.
6. By assignment of mortgage, the loan was ultimately assigned to Nationstar Mortgage LLC. A true and correct copy of the assignment is attached as Exhibit “C” and is hereby incorporated by reference.
7. Debtor(s) filed the instant Chapter 7 Bankruptcy on June 25, 2025 and, as a result, any state court proceedings were stayed.
8. It is believed and therefore averred that Debtor(s) filed the instant bankruptcy as an additional delay in order to prevent Movant from proceeding with the state court proceedings or otherwise institute proceedings as allowed under the Mortgage.

9. Debtor's mortgage loan is in default and is currently due for the May 1, 2025 payment and each subsequent payment through the date of the motion. Debtor(s) has/have failed to make the following payments to Movant:

**PAYMENTS IN DEFAULT**

Monthly Payments in Default	05/01/2025 to 08/01/2025
Monthly payments (\$853.35 x 4)	\$3,413.40
Total Amounts Due as of August 8, 2025:	\$3,413.40

10. In addition, Movant has incurred counsel fees and costs in association with Debtor's default and this motion.
11. As a result of the Debtor's default and failure to make payments or to otherwise adequately provide for Movant in the bankruptcy filing, Movant is not adequately protected and is entitled to relief.
12. To the extent the Court does not find that relief is appropriate, then Movant requests that the stay be conditioned such that in the event the Debtor(s) fall(s) behind on post-petition payments or trustee payments that Movant may receive relief upon default by the Debtor(s) of the terms of the conditional order.
13. Movant requests that the stay of Bankruptcy Rule 4001(a)(3) be waived.

WHEREFORE, Movant, Nationstar Mortgage LLC, respectfully requests this Court to grant the appropriate relief under 11 U.S.C. §362 from the automatic stay as set forth in the proposed order together with waiver of Bankruptcy Rule 4001(a)(3).

Respectfully Submitted:

Stern & Eisenberg, PC

By: /s/ Daniel P. Jones

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Date: August 21, 2025